

PL Sum. J.

Ex. 028



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Transcript of **Gregory E. Stocker**

Wednesday, May 11, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 115458

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

3 - - -

4 W.K., E.H., M.M., R.P., :
5 M.B., D.P., A.F., C.A., :
6 R.K., AND K.P., :
7 Plaintiffs, :
8 vs. : Case No.
9 RED ROOF INNS, INC.; :
10 FMW RRI NC, LLC; RED ROOF :
11 FRANCHISING, LLC; RRI WEST :
12 MANAGEMENT, LLC; VARAHI :
13 HOTEL, LLC; WESTMONT :
14 HOSPITALITY GROUP, INC.; :
15 AND RRI III, LLC, :
16 Defendants. :

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19 VIDEOTAPED DEPOSITION OF GREGORY E. STOCKER

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22 May 11, 2022
23 9:32 a.m.
24 BAILEY CAVALIERI
25 10 West Broad Street
Suite 2100
Columbus, OH 43215

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28 Reported by: Tracy J. Schell

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1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFFS:

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17 RRI NC, LLC; RED ROOF FRANCHISING, LLC; RRI WEST
MANAGEMENT, LLC; WESTMONT HOSPITALITY GROUP, INC., AND
RRI III, LLC:

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1 APPEARANCES (CONTINUED)

2 ON BEHALF OF THE DEFENDANT VARAHI HOTEL, LLC:

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8 ALSO PRESENT:

9 Bruce Sandy, Videographer
10 Christian Novay, Esq.
11 - - -

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1 Q. Do you have any sense of what percentage were
2 franchised at that time?

3 A. Maybe 75 to 80 percent.

4 Q. So your understanding is from May 2017 to the
5 present, the remaining 20 to 25 percent of locations
6 went from Red Roof corporately managed locations to
7 franchisee managed locations?

8 A. Correct.

9 Q. I apologize if I asked this earlier.

10 From May 27 [sic] to the present, has there
11 been anyone other than you in the safety and security
12 department at Red Roof?

13 A. No.

14 Q. During your time as director of safety and
15 security, are you responsible for the safety and
16 security budget of Red Roof?

17 A. Yes.

18 Q. And approximately how large was that budget
19 in 2017?

20 A. I'm not sure.

21 Q. Do you know how large it is today?

22 A. I do.

23 Q. And how large is it today?

24 A. \$20,000 a year.

25 Q. And how is that \$20,000 a year spent?

1 police department. It could be in regards to red flags
2 of prostitution. It could be in regards to red flags
3 of drug activity. It could be in regards to physical
4 security of the property itself. It could be in
5 regards to OSHA safety issues. It could be in regards
6 to just overall general safety on the property.

7 Q. You mentioned prostitution.

8 Has it also related to sex trafficking?

9 A. Yes.

10 Q. So when you're providing subject matter
11 expert consultation and recommendation related to
12 prostitution, what advice do you provide?

13 A. It depends on the circumstance, but typically
14 it would be, you know, consultation to help with the
15 awareness of the employees on the property in terms of
16 the red flags that would be associated potentially with
17 that alleged activity. How to, you know, report it
18 when they see it.

19 Q. Do you provide any advice on how to defer
20 that activity from occurring on the property?

21 A. Yes.

22 Q. And what type of advice do you provide in
23 that area or what is the advice you provide in that
24 area?

25 A. It varies. It's not an all-inclusive list

1 obviously. It depends on, you know, the issue,
2 potential issue.

3 Like I said, I think it's -- you know, it's
4 certainly providing information around red flags. And
5 then most importantly how to effectively and
6 efficiently report that alleged or suspected activity
7 immediately.

8 Q. Red flags exist when the potential illegal
9 conduct is taking place on the property, right?

10 MR. ALLUSHI: Objection.

11 A. Potentially.

12 Q. And reporting occurs after someone on the
13 property observes those red flags, correct?

14 MR. ALLUSHI: Objection.

15 A. Not necessarily. And the reason I say that
16 is because just because a red flag is observed does not
17 conclusively indicate that that activity is occurring.

18 Q. And you stated earlier that, you know, you
19 might see one or two red flags and that doesn't mean
20 the activity is occurring, right?

21 A. Correct.

22 Q. What if there are three red flags?

23 MR. KEITH: Objection.

24 A. The same. I mean, it doesn't necessarily
25 conclusively say that that's occurring. It's really a

1 totality of the particular circumstances and facts.

2 Q. So if there are several men going in and out
3 of a room, women displaying physical abuse and women
4 who are scantily clad, would those be the type of red
5 flags that should result in reporting?

6 A. Yes. If -- if -- if I could qual- -- if all
7 three of those flags, certainly, yes.

8 Q. And what are proactive -- do you advise Red
9 Roof locations on proactive steps they can take to try
10 and prevent prostitution at their property?

11 A. Yes.

12 Q. And what are those steps?

13 A. Again, not all-inclusive. Obviously it's
14 executing to the company policy in terms of the
15 check-in procedure. Obviously adhering to the company
16 policy of reporting suspected illegal activity.
17 Obviously having a good relationship and cooperation
18 with the local police department. Obviously training
19 and awareness and education of the staff on illegal
20 activities including prostitution.

21 Q. When you refer to the check-in procedure,
22 what are you referring to?

23 A. Primarily acquiring identification, photo
24 identification that matches the individual checking in
25 as well as being aware and alert of potential red flags

1 with anybody that may accompany that person at the
2 check-in counter that may be exhibiting red flags of
3 any illegal activities or potential illegal activities.

4 Q. What else can a Red Roof location proactively
5 do at check-in to try to prevent illegal activity on
6 the property?

7 A. I can't answer that question. I mean,
8 there -- there's other things, but I can't provide you
9 an all-inclusive list.

10 Q. Can you identify any of the other things?

11 A. If you could repeat the question again.

12 Q. Sure. So we talked about the check-in
13 procedure, and you said one thing --

14 A. Sure.

15 Q. -- that Red Roof -- strike that -- employees
16 at Red Roof locations should do is acquire photo ID and
17 make sure it matches the person checking in, right?

18 A. Correct.

19 Q. And another would be to observe any other
20 individuals accompanying the person checking in,
21 correct?

22 A. Correct.

23 Q. What other steps -- or are there other steps
24 that can occur at check-in to try and prevent illegal
25 activity on the property?

1 CERTIFICATE

2 STATE OF OHIO:

3 SS:

4 COUNTY OF DELAWARE:

5 I, Tracy J. Schell, a Notary Public in and
6 for the State of Ohio, duly commissioned and qualified,
7 do hereby certify that the within-named GREGORY E.
8 STOCKER was first duly sworn to testify to the truth,
9 the whole truth, and nothing but the truth in the cause
aforesaid; that the testimony then given was reduced to
stenotypy in the presence of said witness, afterwards
transcribed; that the foregoing is a true and correct
transcript of the testimony; that this deposition was
taken at the time and place in the foregoing caption
specified.

10 I do further certify that I am not a
11 relative, employee or attorney of any of the parties
12 hereto; that I am not a relative or employee of any
13 attorney or counsel employed by the parties hereto;
14 that I am not financially interested in the action; and
further, I am not, nor is the court reporting firm with
which I am affiliated, under contract as defined in
Civil Rule 28(D).

15 In witness whereof, I have hereunto set my
16 hand and affixed my seal of office at Lewis Center,
17 Ohio, on this 19th day of May, 2022.

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19 
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21 Tracy J. Schell
22 Notary Public, State of Ohio.

23 My commission expires: November 5, 2023

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